

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

WEST PAVING
AND DEVELOPMENT CORP.

Case Number 11-02219(MCF)

Debtor

Chapter 11

DEBTOR'S MOTION IN COMPLIANCE WITH FRBP 1009 AND LBR 1009-1 AND
CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

COMES NOW, Debtor, by the undersigned counsel to respectfully state and pray:

1. Debtor filed the captioned bankruptcy petition on March 16, 2011.
2. Since the filing of the petition, Debtor has been managing the affairs and operating the business as debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.
3. During the meeting of creditors held in this case, the US Trustee determined that amendments and corrections to the schedules had to be undertaken: particularly; Schedules A, B, D, H and G.
4. The amendments were filed in this case at CM/ECF docket numbers 43 and 44. Debtor amended Schedule A to specifically include the cadaster number of each real property and the specific lot numbers at the corresponding Property Registries.
5. Schedule B was amended to include the \$97,000.00 check issued to Debtor and MAPFRE for the Rincón project. Debtor has a proprietary stake in the check within the statutory provisions of section 541 of the Bankruptcy Code the check is property of the estate.

6. Schedule D was amended to clarify the amounts owed to certain secured creditors, as well as, to include Scotiabank and secured tax liabilities. Schedule G was amended to include the executory contract with the Municipality of Rincón and Schedule H was amended to include Mr. and Mrs. Jose Luis Plaza Delestre as co-debtors to the Banco Santander loans.

7. These amendments include an additional creditor, Scotiabank of Puerto Rico, former RG Premier Bank. This creditor has appeared by counsel at CM/ECF docket number 54.

WHEREFORE, Debtor respectfully requests from the Honorable Court to take notice of the following:

- a) Debtor's compliance with the FRBP 1009 and LBR 1009-1 and
- b) that the amendments as herein detailed have been completed.

CERTIFICATE OF SERVICE

I hereby certify that on this date this motion was filed with the Clerk of the Court using the CM/ECF system, which will send notice of this filing to the US Trustee and all registered participants.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of June 2011.

S/ M^a Mercedes Figueroa y Morgade

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